



Metropolitan Telecommunications

OSS Performance Issues

New Jersey 271 Re-Filing (W.C. 02-67)

**Note: This presentation Is Redacted For Public
Distribution**

Overview

- Verizon's New Jersey systems are not sufficiently operationally viable to support effective competition.
- A strong, open and reliable Operational Support System (OSS) is essential for open competition.
- An ineffective OSS is a barrier to competition.
- Absent an effective OSS, 271 approval must be denied.

MetTel Issues

- Timely Provision of Local Service Request Confirmations (LSRCs) and Rejects as well as timely return of Provisioning Completion Notices (PCNs) and Billing Completion Notices (BCNs) is an essential component of a strong, open and reliable OSS.
- Accurate Provisioning Completion Notices (PCNs) and Billing Completion Notices (BCNs) are another essential component of a strong, open and reliable OSS.

Timeliness Metrics Issues

- Metrics Performance Analysis using Verizon “Flat File” data demonstrates substandard Verizon performance.
- Verizon’s own specific results for MetTel indicate they failed ** of sub-metrics (of ** tracked) for the November through April period .
- MetTel’s calculation of the performance metrics indicate Verizon failed ** sub-metrics (of the ** tracked) for the November through April period.

Timeliness Metrics Issues:

OR-1 and OR-2 Metrics Performance

November and December 2001

Period	State	Platform	Metric	Metric Name	Standard = 95% in: X Hrs	MetTel Observations	MetTel Calculated % Achieved	Verizon Observations for MetTel	Verizon Calculated% Achieved for MetTel	Verizon Industry Aggregate Observations	Verizon Calculated Industry Aggregate % Achieved
200111	NJ	UNE	OR-1-02	OT LSRC FlowThrough	2					1413	99.50%
200111	NJ	UNE	OR-1-04	OT LSRC/ASRC no FC - POTS	24					1242	97.58%
200111	NJ	UNE	OR-1-06	OT LSRC/ASRC FC - POTS	72					290	100.00%
200111	NJ	UNE	OR-2-02	OT Reject FlowThrough	2					627	98.72%
200111	NJ	UNE	OR-2-04	OT Reject no FC - POTS	24					1430	98.88%
200111	NJ	UNE	OR-2-06	OT Reject FC - POTS	72					171	100.00%
200111	NJ	Resale	OR-1-02	OT LSRC FlowThrough	2					18209	96.88%
200111	NJ	Resale	OR-1-04	OT LSRC/ASRC no FC - POTS	24					3917	97.98%
200111	NJ	Resale	OR-1-06	OT LSRC/ASRC FC - POTS	72					305	99.67%
200111	NJ	Resale	OR-2-02	OT Reject FlowThrough	2					2799	98.36%
200111	NJ	Resale	OR-2-04	OT Reject no FC - POTS	24					2603	99.23%
200111	NJ	Resale	OR-2-06	OT Reject FC - POTS	72					287	99.65%
200112	NJ	UNE	OR-1-02	OT LSRC FlowThrough	2					1801	99.44%
200112	NJ	UNE	OR-1-04	OT LSRC/ASRC no FC - POTS	24					1320	98.64%
200112	NJ	UNE	OR-1-06	OT LSRC/ASRC FC - POTS	72					276	99.64%
200112	NJ	UNE	OR-2-02	OT Reject FlowThrough	2					549	100.00%
200112	NJ	UNE	OR-2-04	OT Reject no FC - POTS	24					1395	99.00%
200112	NJ	UNE	OR-2-06	OT Reject FC - POTS	72					146	100.00%
200112	NJ	Resale	OR-1-02	OT LSRC FlowThrough	2					15591	99.33%
200112	NJ	Resale	OR-1-04	OT LSRC/ASRC no FC - POTS	24					3553	98.17%
200112	NJ	Resale	OR-1-06	OT LSRC/ASRC FC - POTS	72					318	98.74%
200112	NJ	Resale	OR-2-02	OT Reject FlowThrough	2					2168	99.72%
200112	NJ	Resale	OR-2-04	OT Reject no FC - POTS	24					1853	98.92%
200112	NJ	Resale	OR-2-06	OT Reject FC - POTS	72					261	110.00%

Timeliness Metrics Issues:

OR-1 and OR-2 Metrics Performance

January and February 2002

Period	State	Platform	Metric	Metric Name	Standard = 95% in: X Hrs	MetTel Observations	MetTel Calculated % Achieved	Verizon Observations for MetTel	Verizon Calculated% Achieved for MetTel	Verizon Industry Aggregate Observations	Verizon Calculated Industry Aggregate % Achieved
200201	NJ	UNE	OR-1-02	OT LSRC FlowThrough	2					2002	100.00%
200201	NJ	UNE	OR-1-04	OT LSRC/ASRC no FC - POTS	24					1580	98.16%
200201	NJ	UNE	OR-1-06	OT LSRC/ASRC FC - POTS	72					458	100.00%
200201	NJ	UNE	OR-2-02	OT Reject FlowThrough	2					696	100.00%
200201	NJ	UNE	OR-2-04	OT Reject no FC - POTS	24					1631	98.71%
200201	NJ	UNE	OR-2-06	OT Reject FC - POTS	72					290	99.66%
200201	NJ	Resale	OR-1-02	OT LSRC FlowThrough	2					21554	99.99%
200201	NJ	Resale	OR-1-04	OT LSRC/ASRC no FC - POTS	24					4033	98.59%
200201	NJ	Resale	OR-1-06	OT LSRC/ASRC FC - POTS	72					387	99.74%
200201	NJ	Resale	OR-2-02	OT Reject FlowThrough	2					2724	99.93%
200201	NJ	Resale	OR-2-04	OT Reject no FC - POTS	24					1998	99.45%
200201	NJ	Resale	OR-2-06	OT Reject FC - POTS	72					361	100.00%
200202	NJ	UNE	OR-1-02	OT LSRC FlowThrough	2					1838	99.56%
200202	NJ	UNE	OR-1-04	OT LSRC/ASRC no FC - POTS	24					1218	98.03%
200202	NJ	UNE	OR-1-06	OT LSRC/ASRC FC - POTS	72					324	100.00%
200202	NJ	UNE	OR-2-02	OT Reject FlowThrough	2					525	98.10%
200202	NJ	UNE	OR-2-04	OT Reject no FC - POTS	24					831	98.68%
200202	NJ	UNE	OR-2-06	OT Reject FC - POTS	72					140	100.00%
200202	NJ	Resale	OR-1-02	OT LSRC FlowThrough	2					16245	99.47%
200202	NJ	Resale	OR-1-04	OT LSRC/ASRC no FC - POTS	24					3681	98.40%
200202	NJ	Resale	OR-1-06	OT LSRC/ASRC FC - POTS	72					290	99.66%
200202	NJ	Resale	OR-2-02	OT Reject FlowThrough	2					2434	99.55%
200202	NJ	Resale	OR-2-04	OT Reject no FC - POTS	24					1759	99.66%
200202	NJ	Resale	OR-2-06	OT Reject FC - POTS	72					308	99.68%

Timeliness Metrics Issues:

OR-1 and OR-2 Metrics Performance

March and April 2002

Period	State	Platform	Metric	Metric Name	Standard = 95% in: X Hrs	MetTel Observations	MetTel Calculated % Achieved	Verizon Observations for MetTel	Verizon Calculated% Achieved for MetTel	Verizon Industry Aggregate Observations	Verizon Calculated Industry Aggregate % Achieved
200203	NJ	UNE	OR-1-02	OT LSRC FlowThrough	2					2031	99.80%
200203	NJ	UNE	OR-1-04	OT LSRC/ASRC no FC - POTS	24					1235	98.14%
200203	NJ	UNE	OR-1-06	OT LSRC/ASRC FC - POTS	72					290	99.66%
200203	NJ	UNE	OR-2-02	OT Reject FlowThrough	2					597	99.16%
200203	NJ	UNE	OR-2-04	OT Reject no FC - POTS	24					943	99.26%
200203	NJ	UNE	OR-2-06	OT Reject FC - POTS	72					170	100.00%
200203	NJ	Resale	OR-1-02	OT LSRC FlowThrough	2					17830	98.48%
200203	NJ	Resale	OR-1-04	OT LSRC/ASRC no FC - POTS	24					3903	99.18%
200203	NJ	Resale	OR-1-06	OT LSRC/ASRC FC - POTS	72					409	99.78%
200203	NJ	Resale	OR-2-02	OT Reject FlowThrough	2					2472	99.56%
200203	NJ	Resale	OR-2-04	OT Reject no FC - POTS	24					1739	99.65%
200203	NJ	Resale	OR-2-06	OT Reject FC - POTS	72					251	100.00%
200204	NJ	UNE	OR-1-02	OT LSRC FlowThrough	2					1746	99.83%
200204	NJ	UNE	OR-1-04	OT LSRC/ASRC no FC - POTS	24					1002	96.91%
200204	NJ	UNE	OR-1-06	OT LSRC/ASRC FC - POTS	72					509	100.00%
200204	NJ	UNE	OR-2-02	OT Reject FlowThrough	2					784	100.00%
200204	NJ	UNE	OR-2-04	OT Reject no FC - POTS	24					352	98.58%
200204	NJ	UNE	OR-2-06	OT Reject FC - POTS	72					187	99.47%
200204	NJ	Resale	OR-1-02	OT LSRC FlowThrough	2					26825	100.00%
200204	NJ	Resale	OR-1-04	OT LSRC/ASRC no FC - POTS	24					4223	98.51%
200204	NJ	Resale	OR-1-06	OT LSRC/ASRC FC - POTS	72					346	98.71%
200204	NJ	Resale	OR-2-02	OT Reject FlowThrough	2					2499	99.92%
200204	NJ	Resale	OR-2-04	OT Reject no FC - POTS	24					1668	98.86%
200204	NJ	Resale	OR-2-06	OT Reject FC - POTS	72					212	100.00%



Timeliness Metrics Issues:

OR-4 Metrics Performance

November 2001 through February 2002

Period	State	Platform	Metric	Metric Name	Standard = 95% in: X Hrs	MetTel Observations	MetTel Calculated % Achieved	Verizon Observations for MetTel	Verizon Calculated% Achieved for MetTel	Verizon Industry Aggregate Observations	Verizon Calculated Industry Aggregate % Achieved
200111	NJ	UNE	OR-4-05	Work Completion Notice % OT	12N Next BD					5952	100.00%
200111	NJ	UNE	OR-4-09	% SOP to Bill Completion Within 3 Business Days	3 Days					1806	94.52%
200111	NJ	Resale	OR-4-05	Work Completion Notice % OT	12N Next BD					20670	99.91%
200111	NJ	Resale	OR-4-09	% SOP to Bill Completion Within 3 Business Days	3 Days					11896	99.39%
200112	NJ	UNE	OR-4-05	Work Completion Notice % OT	12N Next BD					6797	100.00%
200112	NJ	UNE	OR-4-09	% SOP to Bill Completion Within 3 Business Days	3 Days					3112	97.94%
200112	NJ	Resale	OR-4-05	Work Completion Notice % OT	12N Next BD					17881	100.00%
200112	NJ	Resale	OR-4-09	% SOP to Bill Completion Within 3 Business Days	3 Days					10312	99.35%
200201	NJ	UNE	OR-4-05	Work Completion Notice % OT	12N Next BD					9505	100.00%
200201	NJ	UNE	OR-4-09	% SOP to Bill Completion Within 3 Business Days	3 Days					5336	91.12%
200201	NJ	Resale	OR-4-05	Work Completion Notice % OT	12N Next BD					22772	100.00%
200201	NJ	Resale	OR-4-09	% SOP to Bill Completion Within 3 Business Days	3 Days					10234	99.22%
200202	NJ	UNE	OR-4-05	Work Completion Notice % OT	12N Next BD					5478	100.00%
200202	NJ	UNE	OR-4-09	% SOP to Bill Completion Within 3 Business Days	3 Days					1467	95.43%
200202	NJ	Resale	OR-4-05	Work Completion Notice % OT	12N Next BD					17923	99.92%
200202	NJ	Resale	OR-4-09	% SOP to Bill Completion Within 3 Business Days	3 Days					9640	98.98%



Timeliness Metrics Issues:

OR-4 Metrics Performance

March and April 2002

Period	State	Platform	Metric	Metric Name	Standard = 95% in: X Hrs	MetTel Observations	MetTel Calculated % Achieved	Verizon Observations for MetTel	Verizon Calculated% Achieved for MetTel	Verizon Industry Aggregate Observations	Verizon Calculated Industry Aggregate % Achieved
200203	NJ	UNE	OR-4-05	Work Completion Notice % OT	12N Next BD					5935	100.00%
200203	NJ	UNE	OR-4-09	% SOP to Bill Completion Within 3 Business Days	3 Days					1576	91.88%
200203	NJ	Resale	OR-4-05	Work Completion Notice % OT	12N Next BD					21669	100.00%
200203	NJ	Resale	OR-4-09	% SOP to Bill Completion Within 3 Business Days	3 Days					12343	99.13%
200204	NJ	UNE	OR-4-05	Work Completion Notice % OT	12N Next BD					7058	100.00%
200204	NJ	UNE	OR-4-09	% SOP to Bill Completion Within 3 Business Days	3 Days					1908	96.17%
200204	NJ	Resale	OR-4-05	Work Completion Notice % OT	12N Next BD					26288	100.00%
200204	NJ	Resale	OR-4-09	% SOP to Bill Completion Within 3 Business Days	3 Days					17143	99.42%

Timeliness Metrics Issues

- MetTel has utilized both the specific language of the New Jersey metrics and the Verizon published calculation rules in its metrics calculations
- New Jersey Board of Public Utilities Order (Revised Performance Reports) dated March 28, 2002 relating to Dockets TX95120631 and TX98010010 (page 3 para. C). “It has been the experience of Staff since the adoption of the Guidelines in June 2000 that the reports issued to the CLECs and the Board contain discrepancies”

False Notifier Problems

- The notifiers transmitted by Verizon certify the work requested has been completed, analysis of the expected results indicates this is not the case.
- CLECs have no other information source as an alternative to the Verizon notifiers and must rely upon them.

False Notifier Problems

- MetTel examines usage based on the Usage Record Date i.e. the date the End User incurred the usage (i.e Date of Record) as presented on the Verizon Daily Usage File.
 - This usage is utilized to verify the validity of the completion notifier by testing for the expected result.
- Since the cessation of Usage is easier to verify than the commencement, MetTel has analyzed Usage after Loss of Line and its obverse lack of usage after Migration

False Notifier Problems

- Verizon Change Control CR Number 1363 (Correction of the Effective Date on the Line Loss Report) dated May 22, 2000 with an Effective Date of June 17, 2000 clearly states
 - “This bulletin is notification that the Effective Date will be corrected to reflect the completion date of the service order that processed the removal of the end user from the CLEC.”
- MetTel’s analysis shows a clear and indisputable pattern of continuous usage after the Loss of Line Effective Date
- For every TN where the usage is routed to the losing carrier, the gaining carrier is not receiving the usage.

False Notifier Problems: Usage After Loss of Line

As of June 3, 2002

State	TNs on LOL in the Period	TNs with Usage after LOL Effective Date ⁽¹⁾		Days To Achieve % Usage After LOL ED ⁽²⁾	
		#	%	50%	95%
NJ			9.89%	43.31	65.15
NY			33.02%	44.23	130.80
PA			22.39%	2.62	11.68
Grand Total			31.43%	43.84	130.75

(1) For LOL Effective Dates starting at January 1st 2002

(2) For TN with Usage after the LOL ED

False Notifier Problems: Migration Accuracy January to May 2002

Period	# of Migrations (2)	Usage Starting 3 Days from PCN CD		No Usage as of June 3, 2002		Total Late and no Usage	
		# of Migrations	%	# of Migrations	%	# of Migrations	%
January			8.61%		1.99%		10.60%
February			31.10%		7.32%		38.41%
March			17.65%		8.82%		26.47%
April			18.60%		4.65%		23.26%
May (1)			8.22%		2.74%		10.96%
Total			18.06%		4.73%		22.80%

(1) Migration PCN CD up to May 23rd, 2002

(2) Does NOT include payphones



False Notifier Problems: PIC Change Problems

- Likewise, MetTel has also noticed problems when customers request a change in their Long Distance Carrier.
- The selection and change of PIC is one of the oldest processes in the industry and should be the most reliable.
- When PIC changes receive Completion Notices and then calls are misdirected there is a fundamental system quality problem.

False Notifier Problems: PIC Change Problems: First Call Analysis

State		CIC Change Requested to 5237	First Call as Requested		First Call not as Requested			No Pre Subscribed Calls***	
			#	%	#	% From Total	% From TNs with CIC Record	#	%
NJ	First CIC after CIC Change by TN			48.13%		12.88%	21.11%		39.00%
	First CIC after CIC Change by PON			57.24%		11.72%	17.00%		31.03%
NY	First CIC after CIC Change by TN			37.10%		2.73%	6.86%		60.17%
	First CIC after CIC Change by PON			43.17%		2.74%	5.97%		54.09%
PA	First CIC after CIC Change by TN			55.26%		5.92%	9.68%		38.82%
	First CIC after CIC Change by PON			62.60%		4.88%	7.23%		32.52%
Total	First CIC after CIC Change by TN			37.59%		3.05%	7.50%		59.36%
	First CIC after CIC Change by PON			43.60%		2.93%	6.30%		53.47%

* Only calls that are routed to a presubscribed carrier are examined

** Only PIC Change orders to CIC 5237 with a PCN Completion Date between January 1, 2002 and March 31, 2002 are included

*** These lines have not shown a call to a Presubscribed Carrier as of April 26, 2002



False Notifier Problems: PIC Change Problems: Total Calls Analysis

State	Total Calls	Calls Routed to Requested CIC		Calls Routed to Different CIC							
				Calls Routed to Previous CIC		% From Total Calls	Calls Routed to CIC other then Requested or Previous CIC		% From Total Calls	Total	
		#	%	#	% From Total Routed To A Different CIC		#	% From Category		#	% From Total
NJ			75.04%		90.95%	22.70%		9.05%	2.26%		24.96%
NY			85.99%		80.85%	11.33%		19.15%	2.68%		14.01%
PA			65.56%		100.00%	34.44%		0.00%	0.00%		34.44%
Total			85.43%		81.85%	11.93%		18.15%	2.65%		14.57%

* Only calls that are routed to a presubscribed carrier are examined

** Only PIC Change orders to CIC 5237 with a PCN Completion Date between January 1, 2002 and March 31, 2002 are included

*** These lines have not shown a call to a Presubscribed Carrier as of April 26, 2002



Missing Notifier Trouble Ticket Resolution

- Performance has improved overall from the earlier levels.
- Performance has disproportionately improved in NJ more than the work completed in the same shop for states which have received 271 approval.

Missing Notifier Trouble Ticket Resolution: Trouble Ticket Status

Month	March	# Pons on Trouble Ticket	Solved in 3 Business Days		Solved in More Than 3 Business Days		Not Solved		Total not Solved in 3 Business Days		Time to 95%
			# of Pons	%	# of Pons	%	# of Pons	%	# of Pons	%	
March	TOTAL			89.19%		10.81%		0.00%		10.81%	12.18
	NJ (1)			94.23%		5.77%		0.00%		5.77%	3.16
	NY (1)			88.78%		11.22%		0.00%		11.22%	14.08
	PA (2)			66.67%		33.33%		0.00%		33.33%	13.19
April	TOTAL			86.93%		15.19%		0.00%		15.19%	7.21
	NJ (1)			100.00%		8.22%		0.00%		8.22%	2.09
	NY (1)			82.56%		17.44%		0.00%		17.44%	8.31
	PA (2)			80.00%		20.00%		0.00%		20.00%	4.25
May	TOTAL			89.85%		9.98%		0.17%		10.15%	6.31
	NJ (3)			97.53%		2.47%		0.00%		2.47%	1.74
	NY (3)			88.34%		11.46%		0.20%		11.66%	4.87
	PA (3)			100.00%		0.00%		0.00%		0.00%	2.65
Total	TOTAL			89.04%		11.27%		0.06%		11.33%	7.04
	NJ			96.90%		5.43%		0.00%		5.43%	2.65
	NY			87.69%		12.23%		0.08%		12.31%	8.87
	PA			82.93%		17.07%		0.00%		17.07%	3.99

1. As of May 16, 2002
2. As of May 28, 2002
3. As of June 14, 2002



Missing Notifier Trouble Ticket Resolution

- MetTel has experienced a continuing problem where the status responses from Verizon reflect the last notifier transmitted rather than the current status of the PON
- FCC 00-92 requires Verizon transmit the “current status” of the PON
- Verizon Change Control Topic Number 69 (Change Request 1455) is MetTel’s request for a system to positively control the current status of PONs.
 - This CR was submitted 5/15/00.
 - As of 2/5/01 the status was Pending Scheduling
 - The status is unchanged



Missing Notifier Trouble Ticket Resolution

March - April Inaccurate Status Provision In Response to Trouble Tickets

Requested Notifier	Total in Period	Total PONs where Verizon Provided a Lower (Previous) Status That Did Not reflect the Actual Status of the PON	
		#	%
PCN			45.19
BCN			35.98

Conclusion

- MetTel's analyses demonstrate that Verizon's OSS requires remediation before it is adequate for open and free competition.
- Each of the individual problems experienced by MetTel is significant. However, the performance of the OSS must be viewed in its totality, and taken together, the problems presented by MetTel reveal an extremely serious situation where Verizon continues to provide poor service over a large range of OSS functions.